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Of Attorneys for Defendant Michael James DeFrees

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL JAMES DEFREES,

Defendant.

Case No. 3:22-CR-00184-SI

**DECLARATION OF BRIDGET M.
DONEGAN IN SUPPORT OF
DEFENDANT'S UNOPPOSED
MOTION FOR CONTINUANCE
OF TRIAL DATE**

I, BRIDGET M. DONEGAN, hereby declare and say:

1. I have been retained to represent defendant Michael James DeFrees.
2. Mr. DeFrees is out on pretrial release and in good contact with his attorneys.
3. Mr. DeFrees is charged via indictment with two counts of Wire Fraud, in violation of 18 U.S.C. §1343, one count of Bank Fraud, in violation of 18 U.S.C. §1344, and one count of Money Laundering, in violation of 18 U.S.C. §1957.

4. Mr. DeFrees first appeared in this matter on August 11, 2022, and was given a trial date of September 20, 2022.

5. Counsel has secured Volume 1 of the discovery from the government and has been able to review it but has not been able to conduct investigation or complete the review of the case with Mr. DeFrees.

6. Counsel has spoken with Mr. DeFrees and Mr. DeFrees authorized counsel to waive his statutory and Constitutional speedy trial rights for this Court to grant the motion to continue so that counsel could complete the necessary work on his behalf.

7. Assistant United States Attorney Ryan Bounds has advised that the government has no objection to the allowance of this motion.

8. I hereby declare under penalty of perjury that the above statements are true to the best of my knowledge and belief.

DATED this 9th day of September, 2022.

s/ Bridget M. Donegan
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